Message

From: Teri Murrison [Teri.Murrison@swc.idaho.gov]

Sent: 3/20/2017 5:27:19 PM

To: Flint.Hall@deq.idaho.gov; shantel.knowlton@ag.idaho.gov; Fisher, Ralph [fisher.ralph@epa.gov];

Ed.Hagan@deq.idaho.gov; Amy.Williams@deq.idaho.gov; Carolyn Firth [Carolyn.Firth@swc.idaho.gov]

CC: Peak, Nicholas [Peak.Nicholas@epa.gov]
Subject: RE: Follow up comment on draft QAPP.

Thanks, Flint, for being conscientious! I'll let Carolyn confirm our understanding as I'm working on some other spinning plates right now! She should be back with us shortly.

Teri

From: Flint.Hall@deq.idaho.gov [mailto:Flint.Hall@deq.idaho.gov]

Sent: Monday, March 20, 2017 11:23 AM

To: shantel.knowlton@ag.idaho.gov; Teri Murrison <Teri.Murrison@swc.idaho.gov>; fisher.ralph@epa.gov; Ed.Hagan@deq.idaho.gov; Amy.Williams@deq.idaho.gov; Carolyn Firth <Carolyn.Firth@swc.idaho.gov>

Cc: Peak.Nicholas@epa.gov

Subject: RE: Follow up comment on draft QAPP.

Teri,

I haven't had a response back from Carolyn yet, but my understanding is that the results will be reported to ISWCC so the ISWCC can provide interpretation to the grower.

I spoke with Ralph this morning, and thought through the process; with the UIN composed of the fipps code and a serial site no (01, 02, 03..), the sampler would just need to write the number on the questionnaire, the sampling field form, and the soil log. Carolyn would be able to correlate the producer to the result with no need of the sampler keeping that info. Thus no cross-reference list needed. with the sample number structure of fipps - serial site no - sample no (01 - 0-16, 02, 1-2 ft, and so on).

the UIN could be the basis of generating a barcode - if that's what you'd want: instead of writing a UIN, but writing 4 digits separated by a dash is easier, and wouldn't carry any interpretation until Carolyn had all the pieces together.

So, that I think would streamline the process, with only the commission having the info to relate producer to result.

the other questions Ralph and I discussed this morning were analytes and the spikes and blanks.

- It'd make sense that the analytes meet the growers needs, thus a standard soils suite would seem to make sense, unless there's some specific question Carolyn is after thus the chloride analysis that is non-standard, as I understand it, for soils probably doesn't make sense.
- With PE samples, Carolyn indicated that she'll collect some local soils samples for ARS to analyze and then have the same matrix to submit blind with samples to Parma at 3 per shipping day. with an estimated 8 sampling days = 24 samples. and 6 total duplicate sites (36 samples). The duplicates make sense because that tests your sampling contractor. Dropping to 3-4 duplicate sites would still give you 10% QA, however, with how variable a soil matrix can be, that's all up to you. what advice would ARS give you?

I'll go though Ralph's edits, along with those that you've forwarded, Teri, and we should be in good shape for me to complete addressing everyone's comments when I'm back in the office Wednesday (im actually out of the office today and tomorrow). I have Ralph's number if I have more questions for him.

Flint

From: Chapple Knowlton, Shantel [shantel.knowlton@ag.idaho.gov]

Sent: Monday, March 20, 2017 9:27 AM

To: 'Teri Murrison'; Flint Hall; fisher.ralph@epa.gov; Ed Hagan; Amy Williams; Carolyn Firth

Cc: Peak.Nicholas@epa.gov

Subject: RE: Follow up comment on draft QAPP.

My understanding is that all of the records created and collected were to be maintained by ISWCC. Only a summary of the results is to be sent to DEQ. I just want to clarify that the only way ISWCC will be able to protect the identity of growers is if no records are created that link identifying information of the grower or field location to the UIN.

I had left a note in the QAPP concerning section 11.4 which states: "The soil sampling contractor will also maintain a correlation between the producer/grower contact information with specific field and the UIN, communicating that with ISWCC. This will allow the results and recommendations to be communicated with the program participant." This is the type of record that needs to be avoided so that the growers identity cannot be connected to specific results. I believe that a different method needs to be developed to get the results to growers to avoid creating this type of record that links the UIN to the grower.



Shantel Chapple Knowlton

Deputy Attorney General, Natural Resources Division Office of the Attorney General P.O. Box 83720 Boise, ID 83720-0010 208.334.4543 shantel.knowlton@ag.idaho.gov

From: Teri Murrison [mailto:Teri.Murrison@swc.idaho.gov]

Sent: Monday, March 20, 2017 9:07 AM

To: Flint.Hall@deg.idaho.gov; fisher.ralph@epa.gov; Ed.Hagan@deg.idaho.gov; Amy.Williams@deg.idaho.gov; Carolyn

Firth

Cc: Peak.Nicholas@epa.gov; Chapple Knowlton, Shantel

Subject: RE: Follow up comment on draft QAPP.

Hey Flint,

Did you get this answered? Carolyn? Shantel?

Teri

From: Flint.Hall@deq.idaho.gov [mailto:Flint.Hall@deq.idaho.gov]

Sent: Friday, March 17, 2017 5:00 PM

To: Teri Murrison < Teri. Murrison@swc.idaho.gov>; fisher.ralph@epa.gov; Ed. Hagan@deq.idaho.gov;

Amy.Williams@deq.idaho.gov; Carolyn Firth < Carolyn.Firth@swc.idaho.gov>

Cc: Peak.Nicholas@epa.gov; shantel.knowlton@ag.idaho.gov

Subject: RE: Follow up comment on draft QAPP.

Thanks all, I'll dig through comments, and talk to our QA manager to see how to simplify.

To confirm, my understanding is that the field data and the grower info would reside with ISWCC. Only the summary info described as part of the report to DEQ would come to DEQ. The concern is just like our efforts to keep well owner information confidential.

Flint

Sent from my Verizon 4G LTE smartphone

----- Original message -----

From: Teri Murrison < Teri Murrison@swc.idaho.gov>

Date: 3/17/17 4:13 PM (GMT-07:00)

To: "Fisher, Ralph" < fisher_ralph@epa_gov>, Ed Hagan < Ed Hagan@deq_idaho.gov>, Amy Williams

< Amy. Williams@deq.idaho.gov>, Flint Hall < Flint. Hall@deq.idaho.gov>, Carolyn Firth

<Carolyn.Firth@swc.idaho.gov>

Cc: "Peak, Nicholas" < Peak Nicholas@epa.gov >, "Chapple Knowlton, Shantel"

<shantel.knowlton@ag.idaho.gov>

Subject: RE: Follow up comment on draft QAPP.

Flint, et al,

Attached is the draft our attorney (SCK) has adjusted to address Ralph's comments (and some of her own). Have a great weekend!

Teri

From: Fisher, Ralph [mailto:fisher.ralph@epa.gov]

Sent: Friday, March 17, 2017 1:58 PM

To: ed.hagan@deq.idaho.gov; (Amy.Williams@deq.idaho.gov) < Amy.Williams@deq.idaho.gov>; Teri Murrison < Teri.Murrison@swc.idaho.gov>; Flint.Hall@deq.idaho.gov; Carolyn.Firth < Carolyn.Firth@swc.idaho.gov>

Cc: Peak, Nicholas < <u>Peak.Nicholas@epa.gov</u>> **Subject:** Follow up comment on draft QAPP.

Folks, this is a comment/question for you. The Yakima GWMA PHDSS was a success because it focused on confidentially of laboratory results. Producers and program managers alike were concerned that the results of sampling could not be tracked to a specific farmer and his field. That concern has been one of principle concerns voiced in this project as well. So, here is my comment/question. Page 17, 3rd paragraph under the Section 10.2 heading says that a Unique Identification Number (UIN) will be assigned to each producer using a prescribed methodology. What is not clear is whether the UIN will be tied to a producer name and if that information will be maintained by DEQ. Will the UIN be tied to a producer name which is then tied to the data which is maintained by DEQ? If that is the case, that information is subject to access by the public. Based upon earlier discussions, I don't think that is DEQ's intent; I am sure it is not the desire of the Soil Conservation Commission.

The GWMA faced this same problem. In their case the UIN was a bar code. A set of bar code labels were generated for each producer. The contract sampler attached a bar code to each soil sample bag, the questionnaire and all other related sampling forms. He then gave a companion bar code to the producer when he left the field. Beyond that point no one knew which set of data was whose except the producer. In some cases, the producers name may have been on a questionnaire but there was still no way for anyone to know which sampling data was his. The County maintains all the data and records that Flint has identified but the only identifier on any of them is the bar code. To date there has been no attempt by the environmental groups that I am aware of to obtain the data because there was no way to link it back to a producer. I think that is what Flint is attempting to do. We just need to make some points clearer. I have no issues with having a QAP. We just need to be sure it reflects the needs of a specific project(s) and not

Ralph Fisher Nutrient Management Specialist EPA, Boise Operations Office 208-378-5761